

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
ATTORNEYS AT LAW
NEW YORK • CALIFORNIA • LOUISIANA

John C. Browne
johnb@blbgllaw.com
212-554-1398

March 5, 2014

Via Hand Delivery and ECF

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1610
New York, NY 10007-1312

Re: *Louisiana Sheriffs' Pension & Relief Fund v. International Business Machines Corporation, et al.*, 13-cv-8818 (DLC)

Dear Judge Cote:

We represent Plaintiff Louisiana Sheriffs' Pension & Relief Fund ("LA Sheriffs") in the above-captioned matter, and submit this letter together with counsel for defendants International Business Machines Corporation, Virginia M. Rometty and Mark Loughridge ("Defendants").

LA Sheriffs filed its unopposed Motion for Appointment as Lead Plaintiff, and Approval of Its Selection of Lead Counsel on February 10, 2014 (ECF Nos. 9-11), and filed a memorandum of law in further support of its unopposed motion on February 28, 2014 (ECF No. 12).

In the interest of efficiency and in anticipation that the Court may appoint LA Sheriffs Lead Plaintiff, LA Sheriffs and Defendants conferred and jointly propose the following schedule for the filing of an amended complaint and responsive pleadings, as set forth below and in the accompanying Stipulation and [Proposed] Order Regarding Filing of Amended Complaint and Motion to Dismiss:

Filing of Lead Plaintiff's Amended Complaint	May 6, 2014
Filing of Defendants' Motion to Dismiss	July 14, 2014
Filing of Lead Plaintiff's Opposition to Motion	August 28, 2014
Filing of Defendants' Reply Brief	September 29, 2014

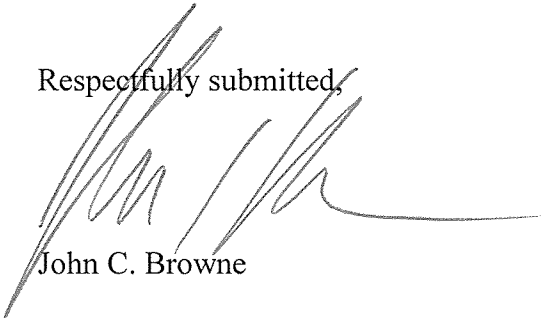


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We appreciate the Court's consideration of the attached Stipulation and [Proposed] Order. We note that the Court has scheduled a hearing on the Lead Plaintiff motions for March 7, 2014. To the extent the Court believes that a hearing may no longer be necessary in view of the foregoing, we respectfully advise the Court that the parties have conferred and do not intend to raise any issues at this time beyond those noted above.

Respectfully submitted,



John C. Browne

Encl.

cc: Richard J. Stark, Esq.
Cravath, Swaine & Moore LLP
Counsel for Defendants